

Exhibit A

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

HUONG HOANG,)
)
) Plaintiff,)
)
 vs.) No. 2:11-CV-01709-MJP
)
 AMAZON.COM, INC., et al.,)
)
) Defendants.)

Videotaped 30(b)(6) Deposition Upon Oral Examination
of
IMDb.com, INC.
(JOHN CAIRELLA)

9:01 A.M.
August 2, 2012
1201 Third Avenue, Ste. 1600
Seattle, Washington

Valerie L. Seaton, RPR, CCR

1 APPEARANCES

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ALSO PRESENT:

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CHARLES WRIGHT

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1 the subscriber information for correcting or adding to
2 IMDb's database?

3 A. No.

4 Q. In the past year, how many times have you
5 used subscriber information to correct or add to IMDb's
6 database?

7 MS. ROOS: Object to form.

8 A. I don't recall any specific case.

9 Q. (BY MR. SZEGO) You don't recall a number or
10 you don't recall having done it at all?

11 A. I don't recall a number and, actually, I
12 don't recall even done it in the last year.

13 Q. When was the last time you recall having done
14 it?

15 A. The only case I can think of is your client.
16 I'm not saying that it's never happened on any other
17 occasion, but I can't think of any other case.

18 Q. What is the website PrivateEye.com?

19 A. It's a database of public records.

20 Q. And do you make use of PrivateEye.com?

21 A. Occasionally, yes.

22 Q. Specifically, do you use PrivateEye.com for
23 the purposes of correcting or adding to IMDb's
24 database?

25 A. For correct information, yes.

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1 Q. And what are the circumstances under which
2 you would use PrivateEye.com?

3 A. Well, someone claims that information is
4 incorrect, and we need to double-check whether that's
5 the case or not.

6 Q. Do you tell people that you're going to use
7 PrivateEye.com before you use it?

8 A. No.

9 Q. Do you tell people that you're going to post
10 the information that results from a PrivateEye.com
11 search before you post that information?

12 A. When people complain that the information is
13 incorrect, we tell them that we will look into it and
14 rectify any inaccuracies.

15 MS. ROOS: Counsel, I'm going to
16 object. This line of questioning does not fall under
17 any of the topics that Mr. Cairella is here to testify
18 regarding.

19 MR. SZEGO: No. 7, "Public records
20 searches performed by IMDb.com for Plaintiff's legal
21 name and/or date of birth, including but not limited to
22 those identified in IMDb.com's responses to Plaintiff's
23 Interrogatories 6 and 7 and Bates documents
24 IMDb001053-1086 and documents regarding searches
25 obtained from Privateeye.com."

1 C E R T I F I C A T E

2 STATE OF WASHINGTON)
3) SS.

4 COUNTY OF PIERCE)

5 I, the undersigned Washington Certified Court
6 Reporter, pursuant to RCW 5.28.010 authorized to
7 administer oaths and affirmations in and for the State
8 of Washington, do hereby certify:

9 That the annexed and foregoing deposition
10 consisting of Pages 1 through 50 of the testimony of
11 each witness named herein was taken stenographically
12 before me and reduced to typed format under my
13 direction;

14 I further certify that according to CR 30(e)
15 the witness was given the opportunity to examine, read
16 and sign the deposition after the same was transcribed,
17 unless indicated in the record that the review was
18 waived;

19 I further certify that all objections made at
20 the time of said examination to my qualifications or
21 the manner of taking the deposition or to the conduct
22 of any party have been noted by me upon each said
23 deposition;

24 I further certify that I am not a relative or
25 employee of any such attorney or counsel, and that I am
not financially interested in the said action or the
outcome thereof;

I further certify that each witness before
examination was by me duly sworn to testify the truth,
the whole truth and nothing but the truth;

I further certify that the deposition, as
transcribed, is a full, true and correct transcript of
the testimony, including questions and answers, and all
objections, motions, and exceptions of counsel made and
taken at the time of the foregoing examination and was
prepared pursuant to Washington Administrative Code
308-14-135, the transcript preparation format
guidelines;

I further certify that I am sealing the
deposition in an envelope with the title of the above

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1 cause and the name of the witness visible, and I am
2 delivering the same to the appropriate authority;

3 I further advise you that as a matter of firm
4 policy, the Stenographic notes of this transcript will
5 be destroyed three years from the date appearing on
6 this Certificate unless notice is received otherwise
7 from any party or counsel hereto on or before said
8 date;

9 IN WITNESS WHEREOF, I have hereunto set my
10 hand and affixed my official seal this 14th day of
11 August, 2012.
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VALERIE L. SEATON, RPR, CCR
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the State of Washington,
residing at Tacoma.
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